

OFFICE OF THE GENERAL COUNSEL
Claudia E. Aguayo, General Counsel (SBN 8351)
Frank Z. LaForge, Assistant General Counsel (SBN 12246)
Scott H. Husbands, Assistant General Counsel (SBN 11398)
University of Nevada, Reno
1664 N. Virginia Street/MS0550
Reno, Nevada 89557-0550
(775) 784-3493
(775) 327-2202 fax
caguayo@unr.edu
flaforge@unr.edu
shusbands@unr.edu

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAHLIA DWEDAR,

Plaintiff,

v.

STATE OF NEVADA EX REL. BOARD OF
REGENTS OF THE NEVADA SYSTEM OF
HIGHER EDUCATION, ON BEHALF OF
THE UNIVERSITY OF NEVADA RENO,

Defendant.

Case No. 3:24-CV-00583-MMD-CLB

**STIPULATION REGARDING
RESCHEDULING OF EARLY NEUTRAL
EVALUATION
(First Request)**

Pursuant to the Court's Order Scheduling Early Neutral Evaluation (ECF No. 16), LR IA 6-2, LR 7-1, LR 16-6 and LR 26-3, Plaintiff Dahlia Dwedar ("Plaintiff") appearing through counsel of record Trevor J. Hatfield, Esq., Defendant Board of Regents of the Nevada System of Higher Education on behalf of the University of Nevada, Reno ("UNR") appearing through counsel of record Claudia E. Aguayo, Esq., Frank Z. LaForge, Esq. and Scott H. Husbands, Esq.,") hereby stipulate and agree to request that the Early Neutral Evaluation set in this matter for June 3, 2025 be continued to one of the agreed-upon dates set forth below. In support of this stipulation and request, the parties jointly submit the following:

1 Plaintiff's counsel initially reached out on April 29, 2025 to discuss the need to
2 reschedule the upcoming Early Neutral Evaluation. Plaintiff's counsel cited a pending trial
3 date that had been scheduled after the Court's order scheduling the Early Neutral Evaluation.
4 The parties informally agreed on the need to reschedule and began working on the logistics of
5 rescheduling the Early Neutral Evaluation including identifying mutually agreeable dates.
6 This also included Defendant's counsel cancelling travel arrangements for the June 3, 2025
7 Early Neutral Evaluation. Early in the week of May 19, 2025, the week this stipulation is
8 being submitted, Plaintiff's counsel advised that the matter set for trial had resolved. Counsel
9 met and conferred and agreed that it would prudent to request the Early Neutral Evaluation be
10 rescheduled. This was based on the following reasons:
11

- 12 1. As of May 19, 2025, the parties would have had just about one week to prepare
13 their early neutral evaluation statements. Counsel agreed that a new date would be
14 important to allow more time to prepare the statements especially with the
15 Memorial Day holiday pending and planned out of office time for counsel.
16
- 17 2. Plaintiff's counsel indicated that Plaintiff might have difficulty attending the June
18 3, 2025 Early Neutral Evaluation in person and that rescheduling would allow for
19 more flexibility in Plaintiff's ability to attend in person. Counsel agreed to further
20 discuss the desirability of requesting that the Early Neutral Evaluation be done in
21 person versus in a virtual format.
22
- 23 3. The additional time afforded by rescheduling the Early Neutral Evaluation will
24 allow the parties additional time to prepare for the Early Neutral Evaluation and
25 possibly engage in the exchange of supplements to their initial disclosures.
26

1 Based on the reasons stated above, the parties agreed to request that the Early Neutral
2 Evaluation be rescheduled. Per LR 26-3, the parties were unable to request that the date be
3 rescheduled 21 days prior to the June 3, 2025 date. While the parties did initiate discussions
4 to reschedule prior to May 13, 2025 (21 days prior to June 3, 2025), the logistics of selecting
5 mutually agreeable dates took some time after initial scheduling discussions on April 29,
6 2025. The parties are therefore submitting this stipulation at their soonest possible
7 opportunity which is in advance of the May 24, 2025 deadline set by the Court's Order
8 Scheduling the Early Neutral Evaluation.
9

10 The parties met and conferred on mutually agreeable dates as per the Court's order.
11 The parties have agreed on the following available dates for rescheduling the Early Neutral
12 Evaluation:
13

- 14 1. June 16, 2025
- 15 2. July 21, 2025
- 16 3. July 23, 2025
- 17 4. August 4, 2025
- 18 5. August 5, 2025
- 19 6. August 7, 2025
- 20
- 21

22 LR 16-6 requires that good cause be shown if the Early Neutral Evaluation is
23 conducted later than 90 days following the first responding party's appearance. Defendant is
24 the one and only responding party and filed its answer on March 21, 2025. June 19, 2025 is
25 the date that is 90 days from March 21, 2025. The parties submit that good cause exists for
26 scheduling the Early Neutral Evaluation after June 19, 2025 based on counsel's conflicting
27 professional obligations. The six dates presented above are the soonest available dates that
28

1 worked for the five to six attendees who would need to participate in the Early Neutral
2 Evaluation.

3
4 This request is being submitted in good faith and not for the purpose of delay.

5 STIPULATED and DATED this 22nd day of May, 2025.

6 /s/ Trevor J. Hatfield

7 Trevor J. Hatfield (SBN 7373)
8 Hatfield & Associates, Ltd.
9 703 S. 8th Street
10 Las Vegas, Nevada 89101
11 (702) 388-4469
12 (702) 386-9825 fax
13 thatfield@hatfieldlawassociates.com

14 **Attorney for Plaintiffs**

6 /s/ Scott H. Husbands

7 Claudia E. Aguayo (SBN 8351)
8 Frank Z. LaForge (SBN 12246)
9 Scott H. Husbands (SBN 11398)
10 Office of the General Counsel
11 University of Nevada, Reno
12 1664 N. Virginia Street/MS0550
13 Reno, Nevada 89557-0550
14 (775) 784-3493
15 (775) 327-2202 fax
16 caguayo@unr.edu
17 flaforge@unr.edu
18 shusbands@unr.edu


19 **Attorneys for Defendant**

16
17 IT IS SO ORDERED. The Early Neutral Evaluation scheduled for June 3, 2025 is
18 **VACATED** and **RESET** for **August 4, 2025 at 10:00 a.m.**

19 IT IS FURTHER ORDERED that the written evaluation statements are due by 4:00
20 p.m. on July 28, 2025.

21 IT IS FURTHER ORDERED that all other provisions of the Court's order (ECF No.
22 16) shall remain in effect.

23 DATED: 5/23/2025

24 
25 DANIEL J. ALBREGTS
26 UNITED STATES MAGISTRATE JUDGE
27
28